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February 25, 2022

BY ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Bang*, 19 Cr. 213 (LJL)

Hon. Judge Liman,

With consent of the government, I write to request an adjournment of Mr. Bang's March 2, 2022, sentence date. Mr. Bang is detained at the Metropolitan Detention Center which was under national lockdown, and then a further lockdown due to other reasons. While MDC has reopened, I was unable to sustain a legal visit with Mr. Bang as he appeared to have health issues that caused him to sneeze incessantly. Unfortunately, I had to terminate the legal visit.

So that we may properly prepare for sentencing, we request a 45-day adjournment of the current sentencing date of March 2, 2022. This is Mr. Bang's second request for an adjournment of sentence.

I thank the Court for its continuing attention to this matter.

Respectfully submitted,

/s/Sabrina P. Shroff
Counsel to Cuong Bang

SPS/mtf
cc: Cuong Bang

So Ordered: _____
Hon. Lewis J. Liman